

HaysMedicalCenter

October 20, 2000

Ms. Magalie Roman Salas
Secretary, Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

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RE: Ultra-Wideband (ET Docket 98-153)

Dear Ms. Salas:

I am writing in regard to the FCC's Notice of Proposed Rulemaking on ultra-wideband (UWB) radio transmissions. Hays Medical Center, Hays, Kansas has engaged in numerous applications of telemedicine for the past decade and has supported a financial data network with up to 40 small rural hospitals for almost twenty years. We have the need to move a significant volume of information with accuracy, speed and security in multiple venues: within the facility, from facility to physician office, from facility to individual homes or nursing homes, and from facility to other hospitals over a vast geography. We have employed band width ranging from POTS to one quarter T-1 on a regular basis. We share the need for more band width and manageable costs with most other health care facilities. UWB is a technology that has the capability of making a significant impact on the success of our mission. We encourage the development of unlicensed UWB above 2 GHz for appropriate health care applications.

The "e-strategy" employed by Hays Medical Center throughout its history has been:

- to move information rather than persons when and where appropriate
- to be good stewards of limited resources - materials and human
- to maximize accessibility
- to keep services as close to home as possible

With that strategy in mind, we have not limited our applications to any one mode of transmission. We have considered the resolution required for a particular application, the cost, and the ability to have that mode installed and maintained. In the process of implementation, various configurations have been successfully implemented. UWB is a technology that will be considered carefully if it is available. As application possibility, band width and costs issues are addressed and satisfied, UWB would be implemented.

As a representative of a small medical facility in a rural geography with limited financial resources, almost unlimited distances and a small, aging population, I would request a consideration of the unique needs of rural America as you complete your deliberations. If regulations and restrictions are difficult to meet or are at a level of cost outside our budgets, the use of technology that would be otherwise very helpful will not be adopted.

Thank you for your consideration of our needs on this most important issue. Please feel free to contact me for any additional information or considerations.

Sincerely,

Robert Cox, M.D.

Robert Cox, M.D.
Medical Director

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